

**FILED****UNITED STATES DISTRICT COURT**

NOV 18 2021

for the

Northern District of Oklahoma

Mark C. McCartt, Clerk  
U.S. DISTRICT COURT

United States of America

v.

KOR VANG

Case No.

21-mj-813-CDL

*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 6, 2019 through June 24, 2020 in the county of Tulsa in the  
Northern District of Oklahoma, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. §§ 2251(a) and 2251(e)

Sexual Exploitation of a Child

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.*Complainant's signature*

HSI Special Agent Dustin Carder

*Printed name and title*Sworn to by telephone before me and signed in my presence.Date: November 18 2021City and state: Tulsa, OK*Judge's signature*Christopher Lutz  
United States Magistrate Judge*Printed name and title*

**AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT IN  
THE NORTHERN DISTRICT OF OKLAHOMA**

I, Dustin Carder, being duly sworn under oath, do hereby depose and state:

**INTRODUCTION**

1. I have been employed as a Special Agent (“SA”) with Immigration and Customs Enforcement (“ICE”), Homeland Security Investigations (“HSI”) since December 2018 and am currently assigned to the Office of the Resident Agent in Charge in Tulsa, Oklahoma, and am currently assigned to investigate crimes involving child exploitation. While employed by HSI, I have investigated federal criminal violations related to child exploitation and child pornography. I have gained experience through training at the Federal Law Enforcement Training Center’s (FLETC) twelve-week Criminal Investigator Training Program (CITP) and the sixteen-week Homeland Security Investigations Special Agent Training (HSISAT) program, and everyday work relating to conducting these types of investigations. I have received training in the area of child pornography and child exploitation and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media. I have received focused child exploitation training covering topics such as: interview techniques, live streaming investigations, undercover investigations, capturing digital evidence, transnational child sex offenders, and mobile messaging platforms utilized by these types of offenders. Moreover, I am a federal law enforcement officer who is engaged in enforcing the criminal laws, including 18 U.S.C. §§ 2251, 2252, and 2252(a), and I am authorized by law to request a search warrant.

2. As a result of my employment with HSI, my duties include, but are not limited to, the investigation and enforcement of Titles 8, 18, 19, 21, and 31 of the United States Code (U.S.C.). I am an “investigative or law enforcement officer of the United States” within the

meaning defined in 18 U.S.C. § 2510(7), in that I am an agent of the United States authorized by law to conduct investigations of, and make arrests for, federal offenses.

3. As part of my duties as an HSI agent, I investigate criminal violations relating to child pornography, including the production, transportation, distribution, receipt, and possession of child pornography, in violation of 18 U.S.C. §§ 2251 and 2252. I have received training in the areas of child pornography and child exploitation and have observed and reviewed numerous examples of child pornography, as defined in 18 U.S.C. § 2256, in all forms of media. I have been involved in several child pornography investigations and am familiar with the tactics used by individuals who collect and distribute child pornographic material.

4. It is my belief that **Kor VANG (DOB: \*\*/\*\*/1986)**, a United States citizen, has violated 18 U.S.C. §§ 2251(a) and 2251(e) (sexual exploitation of a child), in that on or about September 6, 2019, through June 24, 2020, he knowingly employed, used, persuaded, induced, enticed, and/or coerced a minor, MV1, to engage in sexually explicit conduct for the purpose of producing any visual depiction at 13905 East 24<sup>th</sup> Street, Apartment D, Tulsa, Oklahoma, and at 1143 North 89<sup>th</sup> East Avenue, Tulsa, Oklahoma. Both locations are within the Northern District of Oklahoma.

5. Title 18, United States Code, Section 2251(a) states that: Any person who employs, uses, persuades, induces, entices, or coerces any minor to engage in, or who has a minor assist any other person to engage in, or who transports any minor in or affecting interstate or foreign commerce, or in any Territory or Possession of the United States, with the intent that such minor engage in, any sexually explicit conduct for the purpose of producing any visual depiction of such conduct or for the purpose of transmitting a live visual depiction of such conduct, shall be punished as provided under subsection (e), if such person knows or has reason to know that such

visual depiction will be transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or mailed, if that visual depiction was produced or transmitted using materials that have been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer, or if such visual depiction has actually been transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or mailed.

**The source of my information and grounds for my beliefs are as follows:**

6. On November 17, 2021, I obtained a premises search warrant for 1143 North 89<sup>th</sup> East Avenue in Tulsa, Oklahoma. The warrant was signed and authorized by the Honorable United States Magistrate Judge Christine Little in the Northern District of Oklahoma on November 17, 2021. The warrant authorized the search of the premises at 1143 North 89<sup>th</sup> East Avenue for evidence related to child pornography. The warrant further authorized the forensic analysis and search of seized electronic devices and digital media for evidence relating to child pornography.

7. On November 18, 2021, HSI Tulsa special agents (SA), task force officers (TFO) and deputies from the Tulsa County Sheriff's Office served a federal search and seizure warrant at 1143 North 89<sup>th</sup> East Avenue, in Tulsa, Oklahoma, within the Northern District of Oklahoma.

8. Agents and officers made contact with Kor VANG, Mariana Vang, and two minor children at the location. One of the minors is a 14-year-old female (herein after referred to as MV1) that is the biological daughter of Mariana Vang and stepdaughter of Kor VANG; the other minor is a 14-month-old minor infant female that is the biological daughter of Kor VANG and Mariana Vang.

9. After securing the residence and obtaining a jacket for VANG, HSI Erin Staniech and I interviewed him in my vehicle at the scene. The interview was audio and video recorded. I read VANG his Miranda Rights from ICE Form 73-025; VANG waived his Miranda Rights and agreed to speak with agents without an attorney present by signing the provided form. VANG made the following statement, post-Miranda:

- a. One of his email addresses is “kenlee.lee1@gmail.com.” (This is the email address responsible for the downloading of child pornography that triggered the original investigation.)
- b. He is addicted to child pornography and has been for four to five years.
- c. He lived previously at 13905 East 24<sup>th</sup> Street, Apartment D, in Tulsa in September 2019. (This is when the downloading of child pornography occurred that triggered this investigation.) He lived there with Mariana Vang and MV1.
- d. He and his family moved to 1143 North 89<sup>th</sup> East Avenue in Tulsa. (City of Tulsa utilities were placed in his name at this location on June 24, 2020.)
- e. He has a Samsung Galaxy Note 8 and that is the only device he uses. He provided the passcode to this device as “3636,” which unlocked the device.
- f. There may be child pornography on his device now.
- g. He has used cloud storage providers, such as Dropbox and others, to distribute child pornography.

- h. He has communicated and exchanged child pornography with other individuals using electronic applications, such as MeWe.
- i. When the family lived at 13905 East 24<sup>th</sup> Street, Apartment D, in Tulsa, VANG ordered a hidden spy camera concealed within a Bluetooth speaker from Amazon.
- j. He placed this hidden camera in MV1's room while they lived in the apartment; the camera was then taken to MV1's room when the family moved to 1143 North 89<sup>th</sup> East Avenue. (VANG later stated that the camera only worked for approximately one to two months after moving to 1143 North 89<sup>th</sup> East Avenue in Tulsa.)
- k. He had remote access and control of the camera from an application on his cellular phone.
- l. At an unknown date and time, he accessed MV1's phone data by logging into her Apple iCloud account using her account information. In doing this, he obtained nude photographs of MV1 from her phone data.
- m. He has masturbated to the images and videos of MV1 that were collected from the hidden camera.
- n. When shown an image from the folder containing the surreptitiously captured videos and photographs of MV1, he identified MV1 as the person in the image.
- o. He has never inappropriately touched MV1, his infant daughter, or anyone else.

10. Agents and officers reviewed VANG's phone at the scene and located hundreds of videos and images of MV1. MV1 was fully clothed in some images and fully nude with vagina and breasts exposed in others. The images and videos captured MV1 in the shower, and in various stages of disrobe in her bedroom. Several of these images appeared to have the same file date and time, even though they were obviously different events. This most likely means that this was the date the images and videos were imported into that particular folder on the phone. The phone is currently undergoing forensic examination, and the data will be examined further, but it may be impossible to determine an exact date and time that these images and videos were taken.

11. VANG was arrested at the scene and initially transported to HSI Tulsa for paperwork; he was then transported to the Tulsa County Jail on a HSI hold until he can be taken for his initial appearance on the next day Court business is conducted.

12. Additionally, upon a brief review of images on VANG's phone back at HSI Tulsa, I observed an image with filename "ZzFWwu-5DvZNmcN6pRyHoLhhlCh8=Screenshot\_20190714-092800\_MeWe.jpg" that depicts an infant female victim being anally penetrated by an adult penis. The infant's vagina is also exposed in this image. This file constitutes child pornography, according to 18 U.S.C. § 2256.

13. VANG used a Bluetooth speaker to facilitate the offenses cited herein. The Bluetooth speaker used was not manufactured in the State of Oklahoma.

14. A forensic interview of MV1 is planned for the afternoon of November 18, 2021. Mariana Vang is deaf and utilizes sign language to communicate. Tulsa County Department of Human Services Supervisor Monica DiSanto is proficient in sign language and assisted in the



interview of Mariana Vang at the scene of the search warrant. DiSanto is arranging the forensic interview and safety plan for Vang and the children.

**CONCLUSION**

15. Based on the information set forth in this affidavit, I submit there is probable cause to believe that **Kor VANG (DOB: \*\*/\*\*/1986)**, a United States citizen, has violated 18 U.S.C. §§ 2251(a) and 2251(e) (sexual exploitation of a child), in that on or about September 6, 2019, through June 24, 2020, he knowingly employed, used, persuaded, induced, enticed, and/or coerced a minor, his step-daughter, to engage in sexually explicit conduct for the purpose of producing any visual depiction at 13905 East 24<sup>th</sup> Street, Apartment D, Tulsa, Oklahoma, and at 1143 North 89<sup>th</sup> East Avenue, Tulsa, Oklahoma. Both locations are within the Northern District of Oklahoma.



Dustin Carder  
Special Agent  
Homeland Security Investigations

Subscribed and sworn to before me telephonically on the 18<sup>th</sup> day of November, 2021.



UNITED STATES MAGISTRATE JUDGE  
NORTHERN DISTRICT OF OKLAHOMA